

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

IN RE:)	CHAPTER 13
)	CASE NO. 18-11706-SDB
NICHOLAS L. MCGEE)	
)	
)	
)	
Debtor.)	

OBJECTION TO CHAPTER 13 PLAN

LakeView Loan Servicing LLC, (“Creditor”), by and through the undersigned counsel, objects to the Chapter 13 Plan (“Plan”) [DE #6] and states as follows:

- 1) Creditor holds a lien on the following property: 9990 Ga Hwy 305, Keysville, GA 30816 (Loan No. 3017)
- 2) Creditor intends to file a timely Proof of Claim. Creditor estimates a secured amount of **\$92,159.09**, a secured arrearage in the amount of **\$8,731.32**, and an ongoing post-petition payment of **\$684.80**.
- 3) The Plan proposes to pay arrears in the amount of **\$6,000.00** with an initial monthly payment of **\$715.00**.
- 4) The Plan does not provide for the arrears in accordance with the Creditor’s filed Proof of Claim.
- 5) Creditor objects to the proposed Plan treatment.
- 6) Chapter 13 plans are subject to unlimited amendments. As such, the Creditor respectfully requests that the Court not confirm any plan prior to the POC bar date; or until the Debtor files a plan that fully conforms to the filed POC by the Creditor.

7) Creditor reserves the right to amend this Objection.

WHEREFORE, Creditor **LakeView Loan Servicing LLC**, respectfully requests that this Honorable Court sustain the objection and deny confirmation of the Plan.

/s/ James E. Albertelli

James E. Albertelli

Albertelli Law

Georgia Bar No.: 007750

Attorney for Secured Creditor

100 Galleria Parkway, Suite 960

Atlanta, GA 30339

Assistant's Telephone: (813) 221-4743

bkga@albertellilaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of January, 2019, I served a copy of the foregoing on the parties listed below.

SERVICE LIST

Nicholas L. McGee
525 Kilpatrick Street
Midville, GA 30441

Terrance P. Leiden
Leiden & Leiden, PC
330 Telfair Street
Augusta, GA 30901

Trustee
Huon Le
P.O. Box 2127
Augusta, GA 30903

U. S. Trustee
Office of the U. S. Trustee
Johnson Square Business Center
2 East Bryan Street, Ste 725
Savannah, GA 31401

/s/ James E. Albertelli
James E. Albertelli
Albertelli Law
Georgia Bar No.: 007750
Attorney for Secured Creditor
100 Galleria Parkway, Suite 960
Atlanta, GA 30339
Assistant's Telephone: (813) 221-4743
bkga@albertellilaw.com